

Attorney Docket: 071469-0306776  
Client Reference: PC6021A2  
Application No.: 10/705,397

RECEIVED  
CENTRAL FAX CENTER  
NOV 06 2006

#### REMARKS

Claims 1, 11, and 13 are amended hereby. No claims are canceled or added hereby. Accordingly, after entry of this Amendment, claims 1-8 and 10-13 will remain pending.

In the Office Action dated May 4, 2006, the Examiner rejected claims 1-7 and 10-13 under 35 U.S.C. § 103(a) as being unpatentable over Carpenter et al. (U.S. Patent Application Publication No. 2003/0159780) in view of Dando et al. (U.S. Patent No. 6,814,813). Claim 8 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Carpenter et al. and Dando et al. and further in view of McDermott et al. (U.S. Patent No. 6,469,780). The Applicant respectfully disagrees with both rejections and, therefore, respectfully traverses the same.

In the Office Action, the Examiner withdrew the previous indication of allowable subject matter in view of newly relied upon passages in Carpenter et al. In particular, with reference to paragraph [0025], the Examiner noted that Carpenter et al. discusses the use of contact members (intervening structures) at the faces of the first or second chamber to separate them from their connecting structures.

The Applicant respectfully disagrees with the Examiner that the "intervening structures" have any bearing on the contact member recited by the claims in the instant application. Referring to paragraph [0025], the Applicant respectfully submits that the paragraph discusses the mass 18 and the first and second faces 20, 22 of the mass 18. (Carpenter et al. at paragraph [0025].) The face 22 of the mass 18 contacts with the processing chamber 14 and the face 20 of the mass 18 contacts with the transfer chamber 12. (Id.) The paragraph goes on to state that the faces 20, 22 need not contact the chambers 12, 14. (Id.) Instead, as the reference is understood, intervening structures may be provided between the faces 20, 22 and the chambers 12, 14. In other words, additional layers or components may be positioned between the faces 20, 22 of the mass 18 and the chambers 12, 14.

Claims 1-8 and 10-13 recite a dual chamber apparatus and a method for manufacturing a dual chamber system that recite, in combination with other features, an interface plate that includes a contact member configured to separate the first chamber from the second chamber by a predetermined distance, the contact member extending from

Attorney Docket: 071469-0306776  
Client Reference: PC6021A2  
Application No.: 10/705,397

the flange portion, along side the frontal portion, at a position farther from the frontal portion than the insulating plate. Since the contact member extends from the flange portion, along the frontal portion, at a position from the frontal portion farther than the insulating plate, the Applicant believes that the claims, as amended, easily distinguish over the references cited by the Examiner. Simply, none of the references describe or suggest such a construction.

The Applicant further respectfully submits that Dando et al. and McDermott et al. do not correct the deficiencies noted with respect to Carpenter et al. Accordingly, the Applicant respectfully submits that the references cannot be combined to render obvious any of claims 1-8 and 10-13.

Dando et al. describes a chemical vapor deposition apparatus 10 with a mechanical gate 36 mounted for movement within deposition chamber 16. (Dando et al. at col. 4, lines 24-28.) The mechanical gate 36 is slidingly mounted to open and close the passageway 34. (Dando et al. at col. 4, lines 29-36.) There is, however, nothing in Dando et al. discussing, among other things, an interface plate that includes a contact member configured to separate the first chamber from the second chamber by a predetermined distance, the contact member extending from the flange portion, along side the frontal portion, at a position farther from the frontal portion than the insulating plate. At least for this reason, Dando et al. cannot be relied upon to render obvious any of claims 1-8 and 10-13.

McDermott et al. also does not assist the Examiner with a rejection of the claims. McDermott et al. describes an apparatus and a method for detecting particles in reactive and toxic gases. While the Applicant appreciates that McDermott et al. discusses the use of Teflon<sup>®</sup> or other suitable thermally insulating and corrosion resistant material for connectors 36, 42, the Applicant respectfully submits that McDermott et al. does not cure the deficiencies noted with respect to Carpenter et al. and Dando et al. Specifically, there is no discussion of an apparatus or a method that includes, among other features, an interface plate that includes a contact member configured to separate the first chamber from the second chamber by a predetermined distance, the contact member extending from the flange portion, along side the frontal portion, at a position farther from the frontal

Attorney Docket: 071469-0306776  
Client Reference: PC6021A2  
Application No.: 10/705,397

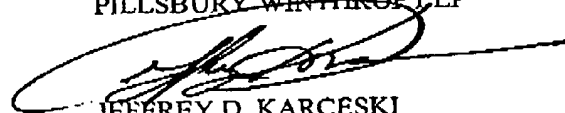
portion than the insulating plate. The Applicant believes, therefore, that the claims easily distinguish over the references cited by the Examiner.

All of the rejections having been addressed, the Applicant respectfully requests that the Examiner withdraw the rejections of the claims and pass this application quickly to issuance.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

PILLSBURY WINTHROP LLP



JEFFREY D. KARCESKI

Reg. No. 35914

Tel. No. 202.663.8403

Fax No. 202.663.8007

November 6, 2006

JDK/dlh

P.O. Box 10500  
McLean, VA 22102